

# What to Provide to OMB

- History of the rule
- Problem to be addressed
  - Quantitative and qualitative analysis
- “Significant Regulatory Action”  
under 12866(3)(f)
- Reason regulation is the best  
solution

# What to Provide to OMB

- Alternatives analysis
  - Expected benefits
  - Secondary benefits
  - Undesirable side-effects
- Justification for chosen alternative

# What to Provide to OMB

- Summary of comments received (when applicable)
- Offer a briefing for complex or economically significant rulemakings

# Analytical Approach

- Benefit-cost analysis (BCA)
- Cost-effectiveness analysis (CEA)
- Major rulemakings should be supported by both, when possible

# Analytical Approach

- If quantified information on benefits is not available, present qualitative discussion of issues and evidence.
- Base analysis on best scientific, technical, economic, or other information available.

# Analytical Approach

- OMB does not require any specific measure of effectiveness
- Explain:
  - measure selected
  - reason why
  - how implemented

# Things OMB Looks For ...

- Consistency
  - with regulatory principles of E.O. 12866
  - with administration policy
  - between rule and preamble
- Compliance
  - with Administrative Procedures Act
  - with other requirements (Paperwork Reduction Act, etc.)

# Coordinated Review

- Rules are shared with subject matter experts within OMB when necessary



# Preliminary issues to note:

- Collects or disseminates information about individuals
- Security or other IT related issues
- Statistical standards
- Information quality concerns
- Risk assessment

# Tips to Remember

- Rulemaking package should be complete and accurate
- Seek and consider opinions of those affected or with special knowledge
- Good analysis is transparent
- Use easy to understand language